misprocessing the orders is now less than one-tenth of one percent (less than one order in a thousand) which is at parity with our retail operations.

3. Maintenance and Repair.

34. Pacific Bell currently offers CLECs three interfaces to perform maintenance and repair functions: manual access through a toll-free number, access to the Pacific Bell Service Manager (PBSM) system, and the Electronic Bonding interface. These permit the CLEC manually or electronically to submit trouble tickets to Pacific Bell. Once the CLEC sends the trouble ticket, it is processed by the system in the same manner as our own retail maintenance or repair. This system, accessed directly or through a Pacific Bell representative, also allows CLECs to retrieve and track the current status of all repair tickets, schedule maintenance appointments by day and time on a real-time basis, verify that the trouble has been resolved, retrieve mechanized loop test (MLT) results, retrieve dispatch codes, and retrieve time and material charges, the nature of the trouble, and how it was resolved.

35. In April 1997, Pacific Bell deployed a third option, electronic bonding, for maintenance and repair. This interface is consistent with ATIS standards and will allow CLECs to perform all maintenance and repair functions (those supported by the ATIS standards).[3] In March, we provided the major CLECs with the technical specifications and a proposed implementation schedule for the interface. Pacific Bell is ready to begin testing this app-to-app interface with any CLEC at any time and anticipates joint testing with MCI late this summer.

36. CLEC and Pacific Bell dispatches are scheduled based on geographic area and class of service of the line experiencing trouble. The scheduling is done in a nondiscriminatory

[3] The relevant standards are: ANSI Standards T1.227-1995 and T1.228-1995, and ECID Trouble Report Format Definition (TRFD) Number 1, as defined in ECID/TRA/95-003.

manner. In fact, because of the automated manner in which the scheduling is done, there is no way for Pacific Bell to discriminate in the scheduling of repair services. Thus, the time for appointments for CLEC customers is the same as for a Pacific Bell customer in the same area with the same class of service.

37. Dispatches are initiated in two ways: manually by a maintenance administrator or by auto dispatch. There are differences in the available methods depending upon whether the trouble is fielded (requires a service technician to visit the site) or nonfielded (does not require a service technician to visit the site). IF a CLEC reports trouble by using the toll-free number, manual input is necessarily required to respond. However, if the CLEC reports trouble using PBSM and Electronic Bonding the flow through capability of these systems will dispatch trouble reports (fielded).

4. Billing.

a) Types of billing information.

38. Billing information for CLECs takes two forms. The first is the detailed call record needed by CLECs to bill their end users for usage-sensitive services, which is handled by a process called data exchange. The second is the billing information provided to the CLEC for payment to Pacific Bell – that is, wholesale information on recurring and nonrecurring charges. The recording of usage data and the aggregation of billing information for presentation to the CLEC are electronic transactions. Both call detail records and the wholesale bill are available through magnetic tape cartridge or NDM. There are no differences in the way Pacific Bell records call detail information for the CLEC and for itself.

b) Billing standards.

39. Industry standards for wholesale billing have not been fully developed. Where standards for components of the bill have been developed, Pacific Bell has implemented them in its billing process. Call detail records are provided in the standard Bellcore EMR format. Where a facilities-based CLEC requires information to allow it to bill IXCs, Pacific Bell will enter into a meet point billing arrangement that follows the industry standard and provides the call detail records to the CLEC. Pacific believes that parity of service is ensured when we use the same systems to bill CLECs that is used to bill our retail customers (CRIS).

D. Access to OSS Functions - UNEs.

1. Pre-Ordering.

40. The pre-ordering process for unbundled elements is the same as that described for resale service. However, not all pre-ordering functions apply to all unbundled network elements. For example, access to telephone number assignment is not applicable to unbundled transport, network interface device (NID), and local loop (links), since these elements inherently do not use telephone numbers on a standalone basis.

2. Ordering & Provisioning.

a) Ordering:

41. Pacific Bell has identified five categories of unbundled network elements (UNEs): loops (links), switches, transport, signaling, and combinations. Each of these elements has a different ordering process. In addition to these five categories, access to the unbundled network interface device (NID), Service Management System (SMS) for Line Information Data Base (LIDB), service management functionality for Advanced Intelligent Network (AIN), and Service

Creation Environment (SCE) became available in April 1997. CLECs have indicated an intention to increase orders for UNEs, and in response we will be introducing ordering of selected UNEs through EDT starting in early 1998.

(1) Loops.

42. Orders for loops are submitted electronically through CESAR (Customers Enhanced System for Access Requests). Those orders are then reformatted and submitted through the SORD system for completion. Interim number portability (INP) can be ordered in conjunction with an unbundled loop. The orders are coordinated to ensure minimum interruption of service based on the CLEC's ability to connect to its switch for dial tone

(2) Switches.

43. Pacific Bell has designed a manual process to handle any CLEC orders for unbundled switch elements (ports), and recently has begun to receive orders from CLECs. Not later than the 2nd Quarter of 1998, Pacific Bell plans to introduce EDI ordering for unbundled switch elements. Should volumes warrant an electronic interface prior to development of an industry standard EDI interface, an interim electronic solution may be developed. Currently, order formats (Local Service Requests, or LSRs) have not been developed by OBF on all switch port types, which is problematic for the development of ordering interfaces that need to be programmed to accept these LSRs.

(3) Transport.

44. CLEC orders for unbundled transport are handled through CESAR, as are IXC orders for access transport.

(4) Signaling.

45. Unbundled signaling is very similar to signaling made available to IXCs today. Ordering is electronic through CESAR.

b) Provisioning:

46. Pacific Bell intends to have all UNEs (as well as resale) handled in a single CSC in 1997. Initially, the CSC will handle 2-wire and asserted links beginning in October of 1997. Provisioning of other UNEs will be added over time. The ratio of employees in the wholesale CSC will be comparable to that in the retail CSC unless the complexity or volumes of wholesale orders requires more employees to maintain parity in processing CLEC orders. The actual flow of the provisioning service order will not change after consolidation. All orders will flow through the same systems as "like" retail services today. The consolidation of work into a dedicated CSC will improve the understanding of CLEC requirements by Pacific Bell's employees and lead to better service.

3. Maintenance and Repair.

a) Loops and switches.

47. Maintenance and repair for loops and switches are provided through the same mechanisms as for resold services, described above. However, CLECs can already perform all the necessary testing on unbundled loops through their own switches. Therefore, once the link service is established, overall testing and isolation is the responsibility of the CLEC. Pacific Bell developed and implemented a test capability for unbundled switching via PBSM and Electronic Bonding. The CLEC can submit a maintenance and repair request for loops or switches by calling a toll free number, utilizing PBSM, or Electronic Bonding, through app-to-app communication.

b) Transport.

48. Maintenance for transport will be treated in the same manner as for IXCs today.

c) Signaling.

49. Maintenance for unbundled signaling will be provided in the same manner as for IXCs today.

4. Billing.

50. Pacific provides billing for unbundled services through CABS (Carrier Access Billing System). This system was designed to support high volume transactions with access like rating structures. The pricing structures for UNEs are access-like and best managed through CABS. For unbundled switching elements (Ports) there will be an exchange of call detail records required by the CLEC to bill their end users.

V. SYSTEMS CAPACITY.

A. Pacific Bell is Now Handling a Large Volume of Orders and Current Efforts Will Increase Capacity Further.

1. Pacific Bell handles 5000-6000 CLEC orders per week.

51. Currently, Pacific Bell is receiving an average of 1500 orders per day for resold services and approximately 35 orders per day for unbundled links. Although we have had backlogs in the past and will undoubtedly experience them in the future as a result of spikes in orders, we do not now have a backlog of orders. We recently brought a new CLEC service center on line in Southern California with 496 employees, and we now have approximately 1000 employees devoted to servicing CLECs on a statewide basis. The implementation of flow through for basic exchange resale on July 21, 1997, after the conversion stabilizes, will further expand Pacific Bell's capacity to approximately 3000 orders per day, assuming the orders are of a type for which flow through is available (*i.e.*, migration as is and migration as specified).

Upgrades in systems and processes and the improved learning curve of our own employees and CLECs' should enable us to increase capacity.

2. Pacific Bell has the ability to scale up for greater capacity as needed, based on CLEC forecasts.

52. Capacity constraints can occur in the network, in software, in hardware, or in interactions between various areas. Pacific Bell monitors the projected capacity available in its systems to handle resale orders, including throughput and response time. If nearing a performance threshold, Pacific Bell works quickly to diagnose the cause and augment its systems. Solutions range from simply changing parameters in software, to adding more network hardware, to buying larger central processing units (CPUs) or splitting an application among multiple CPUs. The time frames to augment capacity are usually weeks rather than months, but time frames can be longer if major software development is required.

53. To ensure that we continue to meet the OSS access needs of CLECs, Pacific Bell monitors manual work centers as demand increases. In work centers where minimal training is required, such as for CSR support and frame attendants, Pacific Bell can increase capacity by augmenting these operations with clerical support and with contracted help. For those areas where extensive training is required, such as the mini-Number Assignment Center, resale service, and link service, Pacific Bell has several methods of meeting increased demand. First, as demand increases, Pacific Bell will hire new employees and use service representatives from Pacific Bell's retail service work centers while the new hires are in training. Training for new service representatives usually lasts 12 weeks. If the increase in demand is expected to be only short-term, Pacific Bell will augment its staff through contracted service representatives.

54. For maintenance and repair functions, Pacific Bell provides CLECs with sufficient total capacity for trouble reporting and test capability for basic resale services. Complex services and UNEs require manual testing. Pacific Bell will augment its force based on internal forecasts and any forecasts received from CLECs. If demand increases more rapidly than expected, Pacific Bell will move resources from its retail channels and contract for additional testers.

55. Although Pacific Bell has put significant effort and resources into estimating future CLEC demand for OSS access, CLEC forecasts are essential to ensuring that Pacific Bell has sufficient resources to meet demand. Pacific Bell encourages all CLECs to submit forecasts of their future needs as far in advance as possible. Without reasonable forecasts, however, Pacific Bell may be unable to satisfy CLEC demands for OSS access – and, to date, most CLECs have been reluctant to provide forecasts. Meeting demand must be a shared responsibility, not solely the burden of Pacific Bell.

VI. CONCLUSION.

56. We are currently providing resold services and unbundled network elements to CLECs. Our OSS functions can be effectively accessed by all CLECs. Pacific Bell currently has mechanized systems available and working for each separate function identified by the Commission and is providing access to CLECs at parity in almost every area. We are also committed to implementing industry standards as they are developed, and we are working

cooperatively with CLECs to develop those standards and, in the interim, to improve existing forms of electronic access.

The information contained in this affidavit is true and correct to the best of my knowledge and belief.

John T Stankey

Subscribed and sworn to this 8TH day of July 1997.

Mary Lee
Notary Public

CERTIFICATE OF SERVICE

I, Suzan B. Ard, hereby certify that on this 10th day of July, 1997 copies of the foregoing "**COMMENTS OF PACIFIC BELL, NEVADA BELL, AND SOUTHWESTERN BELL TELEPHONE COMPANY**" regarding, CC Docket No. 96-98 , RM 9101, were served by hand or by first-class United States Mail, postage prepaid, upon the parties appearing on the attached service list.

BY: Suzan B. Ard
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